

THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA

CRIM. NO. 99-295 (DRD)

Plaintiff,

v.

MICHELLE RODRIGUEZ-MATOS

Defendant

**DEFENDANT MICHELLE RODRÍGUEZ-MATOS' MOTION TO JOIN MOTION TO  
DISMISS COUNT IV OF THE INDICTMENT FILED BY DAVID VEGA-MOLINA  
BEFORE THE HONORABLE COURT:**

Comes now defendant MICHELLE RODRIGUEZ-MATOS through the undersigned counsel and respectfully sets forth and prays:

1. Defendant was tried and convicted with David Vega-Molina in Count IV for violation of **Title 18 U.S.C. § 12103 (a)** alleging a conspiracy to take a foreign national hostage.
2. Defendant Michelle Rodriguez-Matos and co-defendant Vega-Molina are in the same legal position as to Count IV in the ***Ex Post Facto Claim***, for such reasons we request that the Court allow defendant, Michelle RODRÍGUEZ-MATOS to join the Motion to Dismiss Count IV filed by David Vega-Molina.

WHEREFORE, defendant, Michelle RODRÍGUEZ-MATOS prays that the Court allow her to join the Motion to Dismiss Count IV and Dismiss Count IV filed by David Vega-

Molina and as a consequence, enter an ORDER granting the instant request.

San Juan, Puerto Rico, July 25, 2005.

I CERTIFY: A copy of this document has been delivered to Mr. Antonio R. Bazán, Assistant United States Attorney, Torre Chardón, Suite 1201, 350 Chardón Avenue, San Juan, Puerto Rico 00918; Héctor A. Deliz Barrera, P.O. Box 195314, San Juan, PR 00919-5314; Francisco M. Dolz, P.O. Box 361451, San Juan, Puerto Rico 00905; Julio Morales Sánchez, 141 O'Neill Street, San Juan, Puerto Rico 00918 and to Michelle Rodríguez Matos, #19156-069, Metropolitan Detention Center, P.O. Box 2147, San Juan, Puerto Rico 00922.

JOSÉ C. ROMO MATIENZO  
USPRDC 127810  
504 Carlota Matienzo  
San Juan, Puerto Rico 00918-3229  
Tel. (787) 753-7600; Fax: (787) 765-8087